

DIVISION OF ENVIRONMENTAL PROTECTION

Cecil H. Underwood GOVERNOR 1356 Hansford Street Charleston, WV 25301-1401

JOHN E. CAFFREY DIRECTOR

January 6, 1998

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ed Armon, General Manager Coyne Textile Services 1111 Vernon Street Huntington, WV 25704-2050

Dear Mr. Armon:

Enclosed is a copy of the Compliance Evaluation Inspection (CEI) Report completed by representatives of the Chief of the Office of Waste Management. This report is based on the investigation conducted on October 29, 1997.

Please refer to the **Notice of Violation** for those violations discovered during the course of this inspection. As a result of those violations, this report is being referred for the following action:

	Correct noted violations Notice of Violation
V	Civil and Administrative Penalty (CAP) Enforcement Referral
	Lindicomontification

A copy of this report is being transmitted to the United States Environmental Protection Agency (U.S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation. If you have any questions concerning the inspection or the attached report, please to contact Inspector P. L. Brown at (304) 256-6850.

Sincerely,

Thomas A. Fisher, Inspector Supervisor

Shows a. Lit

Compliance Assurance and Emergency Response

TAF/kw

CC:

Jeanne Sofield, U.S. EPA Region III Inspector P. L. Brown

Civil and Administrative Enforcement

File



DIVISION OF ENVIRONMENTAL PROTECTION

CECIL H. UNDERWOOD
GOVERNOR

Office of Waste Management

JOHN E. CAFFREY DIRECTOR

LARGE QUANTITY GENERATOR--COMPLIANCE EVALUATION INSPECTION

The regulations for this inspection are the WV Hazardous Waste Management Act (22-18) & 40 CFR 260-265. These regulations apply to facilities generating >1000kg/month of Hazardous Waste (HW).

COMPANY: Coyne Textile Services		EPA ID#: <u>WVD</u>	052574753		
MAILING ADDRESS: 1111 Vernon St	reet	LOCATION:	Same		
Huntington, WV	25704-2050	COUNTY: (099) V	Vayne	PHONE: 304-4	129-5585
COMPANY CONTACT: Ed Armon &	Jerry Clay TITLE:	General Manager / Mair	nt. Supervisor	ADV. OF AUTH	ORITY: <u>Y</u>
DATE INSPECTED: 10/29/97	INSPECTORS: (1	I) Penny L. Brown	DATE	PREPARED:	11/10/97
TIME OF INSPECTION: 1120	(2	2) Henry E. Haas	PREPAI	RED BY: Penny	L. Brown
VIOLATIONS:(Y/N) Y ACTION TA	AKEN: <u>NOV</u> FACIL dmEnfRet/Other)	ITY DESCRIPTION: Ind	ustrial Laundry	with Maintenar	ice Shop
Hazardous Waste Codes Was	te Description V	Vaste Amount	Disposa	l Company /	Method
D008/D018/D039/D040 parts	s cleaner waste a	pprox. 13-15 gal/month	Safety K	(leen, Smithfield	, KY
D001/D008/D039/D040/F002/F003/F00	5 WWT sludge ap	px.5000 gal(23 tons)/mor	nth United O	il Recovery, Me	riden, CT
D001/F002/F003/F005/D018/D039/D0	040 shop rags conta	aminated with hazardous	wastes recycle	d by laundering	on site
F002/F005 wash	n-water screenings a	pprox 20 tons per year	Brownin	g Ferris Ind. Lar	ndfill

INSPECTION REPORT

On October 29, 1997, inspectors Haas and Brown conducted a Compliance Schedule Evaluation at Coyne Textile Services in Huntington, WV. Upon arrival we met Ed Armon, general manager and Jerry Clay, maintenance supervisor, who had not been previously advised of our intentions to inspect the facility. The representatives were then informed that this inspection would emphasize the facility's compliance with the WV Hazardous Waste Management Act and the Regulations promulgated thereunder.

Coyne Textile Services (CTS) is a large quantity generator, primarily due to generation of waste water treatment sludge which contains both characteristic and listed hazardous wastes. The facility also has a maintenance garage with a satellite accumulation area for waste paint / thinner, used oil, and used antifreeze.

WASTE MINIMIZATION: The Dissolved Air Floatation (DAF) system generates hazardous waste sludge at a rate of nearly 5,000 gallons per month, causing Coyne to have Large Quantity Generator status. This volume of hazardous waste sludge could possibly be reduced by installation of a permanent in-line de-watering device such as a filter press. Also, encouraging customers not to pour spent solvents onto the shop rags prior to pick-up would reduce the poundage of hazardous waste received, and possibly also the volume generated.

Facility Name: Coyne Textile Services Date of Inspection: 10-29-97 Large Quantity Generator CEI Checklist Page 2 of 8
40 CFR Part YES NO N/A

40 CFR Part		YES		
262.11	Has facility completed a HW determination for all waste streams? NOT APPLYING LISTED "F" CODES FOR HAZ WASTES	1.	X	
262.12	Has facility notified for all HW streams?	X	ļ.,	\sqcup
262.10	Is facility treating, disposing, or storing HW >90 days?	╀	X	—
262.20(a)	Is UHW Manifest OMB control #2050-0039 on EPA Form 8700-22 used? NOT FOR ALL SHIPMENTS OF HAZ WASTE	_	X	-
262.20(a)	Are all manifests properly completed? NO MANIFEST # ON ONE, LAND BAN FORMS INCOMPLETE FOR SLUDGE	 	X	Ш
262 Subpart C	Before offering HW for transport off-site, does generator	X	上	
262.30	Package in proper containers?	X	L	
262.31	Label with DOT sticker or placard?	X		Ш
262.32	Mark with HW sticker or placard?	X		
262.33	Does generator offer initial transporter appropriate placards?	X		
262.34	Accumulation Time:		-	
262.34(a)	Is all HW within 90 days shipped off-site or placed in permitted or interim-status area on-site?	X		
262.34(a)(1)	Are all containers closed, in good condition and compatible with their contents?	T		X
• •	Are container areas inspected at least weekly?	X		
	Are containers holding ignitable or reactive wastes located at least 50 ft from facility property line?	X		
262.34(a)(2)	Is accumulation start date clearly marked and visible on each container?		Т	X
262.34(a)(3)	Is each on-site HW container & tank labeled "Hazardous Waste"?	İχ	\vdash	П
262.34(a)(4)	Is aisle space sufficient (minimum 1 container width)?	X	┪	\vdash
265 Subpart C	Preparedness & Prevention:	1	١-	
* *	Has generator installed	+	-	
	Instructive communications or alarm system for facility personnel?	X	+	\vdash
		 \hat{x}	\vdash	
	Device at generation points for summoning local emergency response organization?	l x	├-	\vdash
	Fire control equip. & adequate suppression chemicals or water?	l x	+-	\vdash
	Is facility maintained & operated to minimize risk of fire/explosion/release of HW?	l â	\vdash	┤┤
	Has facility made arrangements with local emergency response agencies/hospitals/contractors?	+^	⊢	\vdash
265 Subpart D	Contingency Plan:	+	1	
	Does the contingency plan contain	+	X	-
• •	Detailed emergency procedures facility personnel will implement in response to fire/explosion/release of HW? -need this	╁	X	┝┈
• •	Detailed description of arrangements with local emergency organizations?	X	⊢	├
• •	Updated names, addresses & phone #'s of emergency coordinator(s) on 24 hr basis?	X	-	\vdash
	A listing of appropriate emergency equipment and evacuation plan?	X	┞-	<u> </u>
• •	Has the plan or update been submitted to local emergency response organizations and does facility maintain a copy on-site?	X	_	
	Are the provisions of the plan carried out immediately whenever a fire/explosion/release of HW occurs?	<u> </u>	╙	X
	Are facility emergency coordinators familiar with their applicable responsibilities in the event of an emergency?	X	L	igspace
265.16	Training:	<u> </u>	Ŀ	<u> </u>
265.16(d)(1)	Are records of names & job titles maintained for personnel involved in HW management?	X		
265.16(d)(2)	Written position description for above personnel?	X		
265.16(d)(3)	Written description of training for above personnel?	X		
265.16(a)(3)	Does training include (where applicable)		-	
265.16(a)(3)i	Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment?	X		
265.16(a)(3)ii	Key parameters for automatic waste feed cut-off systems? WWT Sludge Tank feed is manual.	T	Г	X
265.16(a)(3)iii	Location and use of communications or alarm systems?	X	T	
265.16(a)(3)iv	Response to fires, explosions, spills, and groundwater contamination incidents?	X		\Box
265.16(a)(3)v	Procedures prior to and during shutdown of operations?	X	1	\vdash
265.16(c)	Have facility personnel completed an annual review of initial training?	X	\vdash	\Box
265.16(d)(4)	Does facility maintain records documenting the required training has been completed by above personnel?	TX		
262.34(c)	Satellite Area Accumulation:	†	1-	
265 Subpart I	Are all satellite containers closed, in good condition, and compatible with contents?	+-	T _X	_
262.34(c)(1)ii	Are all satellite containers marked with the words "Hazardous Waste" or other words identifying the contents?	+-	X	_
262.34(c)(2)	For excess amounts of HW, is generator complying with 262.34(a) within 3 days of start of excess accumulation?	+	+~	X
		+-	┼	x
262.34(c)(2)	For excess amounts of HW, is each container marked with date of start of excess accumulation and properly labelled?	+-	-	 ^
262 Subpart D	Record Keeping & Reporting:	+	X	
	Does generator maintain on-site	+-	+^	\vdash
262.40(a)	Copies of all signed manifests for a minimum of 3 years from date of initial transport?	X	\vdash	₩.
262.40(b)	Copies of each annual or biennial report for a minimum of 3 years from report due date?	1.	-	Х
262.40(c)	Copies of all test results and waste determinations for a minimum of 3 years from last date transported off-site?	X	_	
262.42	Does generator follow appropriate reporting procedures for manifest exceptions and discrepancies?	L X	<u></u>	



DIVISION OF ENVIRONMENTAL PROTECTION

CECIL H. UNDERWOOD GOVERNOR Office of Waste Management

JOHN E CAFFREY DIRECTOR

COMPLIANCE EVALUATION INSPECTION REPORT--CONTINUED

Manifests for shipments of the hazardous waste sludge do not include the F003/F005 description, but indicate that the sludge contains toluene and xylene. This is an area of concern since the listed "F" codes carry through the process from the rags received containing spent solvents, to the wash-water screenings, to the wash-water itself if it exits the system before passing through the DAF unit. Since the facility has not been manifesting the sludge as an "F" waste, they may have failed to carry the codes through in making their hazardous waste determination for the sludge and the wash-water screenings. None of the Land Ban Notification (LBN) Forms had the F003/F005 codes for spent solvents marked (non-compliance 1). Only one LBN Form (CTF0658114) had any spent solvents marked (tetrachloroethylene and trichloroethylene), however, did not have the actual "F" code associated with these wastes marked. The same LBN Form was incorrectly marked "D041" to indicate the waste contains2,4,5-trichlorophenol, a pesticide. Except for the above-referenced form, all of the Hazardous Waste Manifests and other LBN forms were marked to indicate the waste is ignitable (D001) and contains characteristic waste codes D008 (lead), D039 (tetrachloroethylene), and trichloroethylene (D040). One Safety-Kleen receipt for parts-cleaner waste did not have the Uniform Hazardous Waste Manifest [required for large quantity generators] attached (non-compliance 2). A copy of the Safety-Kleen receipt and copies of all manifests having incorrect LBN forms were obtained (attachment A).

Wash-water screenings collected in a small hopper which is emptied into a covered roll-off outside when full (about once a week) amount to approximately 20 tons per year of listed hazardous waste generated [the "F" codes carry over from the shop rags received]. CTS had this waste analyzed for TCLP and found it to be non-characteristic (attachment B), but failed to complete a proper hazardous waste determination by including the listed "F" codes from the incoming rags (non-compliance 3). The full roll-off of waste is sent to BFI Landfill for disposal as a non-hazardous waste (attachment C). CTS is not shipping this waste to a permitted TSDF for disposal as a hazardous waste (non-compliance 4). Coyne Textile Services is not completing a Uniform Hazardous Waste Manifest for shipments of this waste to the disposal company (non-compliance 5). The characterization of the wash-water screenings was listed as an area of concern during the last inspection: "Lint and debris screened from the wastewater prior to pre-treatment should be collected and disposed of as hazardous waste also (area of concern). This lint and debris is a hazardous waste as defined in the mixture rule [40 CFR Part 261.3(a)]". Dryer lint generated by the facility is not a hazardous waste provided it is collected, stored and shipped separately from the wash-water screenings.

There have been several significant changes in facility operations in the past year. Shop rags brought in nightly are cleaned beginning the next morning. The facility acknowledges that the rags contain solvents including xylene and toluene. Rags are no longer stored or accumulated outside. A system of tagging now identifies the generator of the dirty rags, type of rag, amount generated, number of rags per pound, and day picked up from the generator. During our inspection we examined both the rags being cleaned and the tags. We found a variable range

of number of rags per pound (small orange shop towels) from about 4.5 rags per pound to 12 rags per pound. The same type of dry rags going out to the customers are 20 rags per pound. This is an area of concern indicating that some customers may be disposing of their wastes by pouring them onto the rags prior to pick up.

The issue of accepting and laundering solvent-soaked rags without a manifest has been somewhat resolved. While the facility may not be completely in compliance regarding this issue, at this time CTS Huntington may accept for laundry recycling, dirty shop towels containing listed and characteristic wastes without having a TSD permit, provided the rags continue to be cleaned as soon as possible (no storage takes place) and *all* of the following is true for *each* category of customer:

- <u>Category 1:</u> Customer is a conditionally exempt generator (generates <220lbs of hazardous waste per month) or non-handler of hazardous wastes.
- Category 2: Customer is a small quantity generator (generates between 220lbs and 2200lbs of hazardous waste per month), and

Customer has a contract with CTS specifying the exact type of waste on the rags and the frequency of shipments to CTS, and

The vehicle used to transport the dirty rags to the CTS facility and to deliver clean rags back to that customer is owned and operated by CTS.

- Category 3: Customer is a large quantity generator (generates over 2200lbs of hazardous waste per month), and Customer completes a Uniform Hazardous Waste Manifest to accompany each shipment of dirty rags to CTS.
- Category 4: Customer is a small quantity generator (generates between 220lbs and 2200lbs of hazardous waste per month), and

Customer is a new or occasional customer of CTS, and does not have a contract as explained in Category 2, and

Customer completes a Uniform Hazardous Waste Manifest to accompany each shipment of dirty rags to CTS.

The overall appearance of the facility continues to improve and appears to now minimize risk of fire, explosion, and release of hazardous waste.

The facility has a 55-gallon satellite accumulation container for paint / thinner waste generated in the shop. The container was not closed (non-compliance 6) and was not labeled with the words "Hazardous Waste" or other words identifying the contents (non-compliance 7). A facility may accumulate up to 55-gallons of hazardous waste for an unlimited time as long as the container is: located at the point of generation, kept closed, labeled to identify contents, kept in good condition. Once the 55-gallon limit is reached, the container should be marked with the date the drum was finally filled, and the 90-day generator accumulation time begins. The waste must be manifested to a permitted TSDF for disposal.

The wastewater tank and secondary containment appear to be in good condition. The tank feed is manual. A clear plastic tubing is used to gauge the level in the tank. There was 2 to 4 inches of liquid, probably rainwater, standing in the secondary containment area. Mr. Clay said the secondary containment area is inspected daily and cleaned weekly, with all standing water pumped directly back to the DAF unit located immediately inside the building. While the distance between the tank and the road behind the facility has not been measured, the tank appears to meet the requirements [Tables 2-1 through 2-6 of the NFPA "Flammable and Combustible Liquids Code"] for protective distances required by 40 CFR 265.198 for tanks accumulating or storing ignitable or reactive waste. Mr. Clay showed us the inspection logs for the tank. All appeared to be properly completed.

CTS's site contingency plan does not include procedures for personnel to implement in the event of a release of hazardous waste (non-compliance 8). This was previously noted as violation #5 in the 1996 CEI report. The plan does include procedures for responding to fires/explosion/accidents.

CTS is currently under Administrative Order HW-395-94, signed September 16, 1994 by Robert B. Schaffer. The requirements of the order have not yet been met due to a delay in comment period by the Office of Waste Management (OWM). Item 2 under "Requirements of Order" stipulates deadlines for compliance will be extended accordingly. Items 3.A, 3.B, and 3.C of the Requirements have been satisfied. Removal and disposal of soil exceeding 500 ppm TPH has been completed according to CTS representatives in an October 8, 1997 meeting; however, no further groundwater monitoring activities have been undertaken (area of concern). The facility should schedule this as soon as possible upon receipt of OWM's comments.

We concluded the inspection, thanked the representative for his cooperation, then departed.

COMPLIANCE EVALUATION

Non-compliances:

The following violations of the WV Hazardous Waste Management Regulations (33 CSR 20, hereinafter the Regulations) were noted during this inspection:

- (1) None of the Land Ban Notification (LBN) Forms had the F003/F005 codes for spent solvents marked. This is in violation of 40 CFR Part 268.7(a)(1)(ii) as referenced by Section 10.1 of the Regulations.
- (2) One Safety-Kleen receipt for parts-cleaner waste did not have the Uniform Hazardous Waste Manifest [required for large quantity generators] attached. This is in violation of 40 CFR Part 262.20(a) as referenced by Section 5.1 of the Regulations.
- (3) CTS Huntington failed to complete a proper hazardous waste determination by including the listed "F" codes from the incoming rags. This is in violation of 40 CFR Part 262.11 as referenced by Section 5.1 of the Regulations.
- (4) CTS Huntington failed to ship the wash-water screenings to a permitted TSDF for disposal as a hazardous waste. This is in violation of 40 CFR Part 262.12(c) as referenced by Section 5.1 of the Regulations. NOTE: This was previously listed as an area of concern in the 1996 CEI report.
- (5) CTS Huntington is not completing a Uniform Hazardous Waste Manifest for shipments of this waste to the disposal company. This is in violation of 40 CFR Part 262.20 as referenced by Section 5.1 of the Regulations.
- (6) Satellite container for paint/thinner in the shop area was not closed. This is in violation of 40 CFR Part 265.173(a), required by Part 262.34(c)(1)(i) as referenced by Section 5.1 of the Regulations.
- (7) Satellite container for paint/thinner in the shop area was not marked with the words "Hazardous Waste" or with other words identifying the contents. This is in violation of 40 CFR Part 262.34(c)(1)(ii) as referenced by Section 5.1 of the Regulations.
- (8) CTS Huntington's site contingency plan does not include procedures for personnel to implement in the event of a release of hazardous waste. This is in violation of 40 CFR Part 265.52(a), required by Part 262.34(a)(4) as referenced by Section 5.1 of the Regulations. NOTE: This was previously listed as violation #5 in the 1996 CEI report.

Concerns:

The following areas of concern were noted during this inspection:

- (1) Manifests for shipments of the hazardous waste sludge do not include the F003/F005 description, but indicate that the sludge contains toluene and xylene. This is an area of concern since the listed "F" codes carry through the process from the rags received containing spent solvents.
- (2) Dryer lint should be collected separately from the wash-water screenings so that it does not have to be disposed of as hazardous waste.
- (3) We found a variable range of number of dirty rags per pound compared to clean dry rags. This is an indication that some customers may be disposing of their wastes by pouring them onto the rags prior to pick up.
- (4) No further groundwater monitoring activities have been undertaken since the last inspection. CTS Huntington should schedule this as soon as possible in order to regain compliance with Administrative Order HW-HW-395-94.



CECIL H. UNDERWOOD GOVERNOR

DIVISION OF ENVIRONMENTAL PROTECTIONOffice of Waste Management

JOHN E. CAFFREY DIRECTOR

NOTICE OF VIOLATION Page 1 of 2

DA	ATE:	October 29, 1997 TIME: 1120
IS	SUE	D TO: Coyne Textile Services, Huntington
EF	PA 1.[D.#:WVD052574753 NOV #:_IV-790111-09P
FΑ	CILI	TY MAILING ADDRESS: 1111 Vernon Street, Huntington, WV 25704
FA	CILI	TY REPRESENTATIVE: Ed Armon, general manager
ins Pe	pecti rmit i	On the date and time specified, an authorized agent of the Chief of the Office of Waste Management conducted an ion of the facility described above in accordance with West Virginia Code, Chapter 22, Section 18 and/or an Order or issued pursuant to §22-18. During that inspection the following violation(s) were noted:
1.	A.	(Regulation) 40 CFR Part 268.7(a)(1)(ii) as referenced by 33 CSR 20 Section 10.1
	В.	(Facts) None of the Land Ban Notification (LBN) Forms had the F003/F005 codes for spent solvents marked.
_		40.05D D
2.	Α.	40 CFR Part 262.20(a) as referenced by 33 CSR 20 Section 5.1
	B.	One Safety-Kleen receipt for parts-cleaner waste did not have the Uniform Hazardous Waste Manifest attached
3.	Α.	40 CFR Part 262.11 as referenced by 33 CSR 20 Section 5.1
٠.		CTS Huntington failed to complete a proper hazardous waste determination by including the listed "F" codes from the
	_,	incoming rags.
4.	A.	40 CFR Part 262.12(c) as referenced by 33 CSR 20 Section 5.1
	B.	CTS Huntington failed to ship the wash-water screenings to a permitted TSDF for disposal as a hazardous waste.
5.	Α.	40 CFR Part 262.20 as referenced by 33 CSR 20 Section 5.1
Э.		CTS Huntington is not completing a Uniform Hazardous Waste Manifest for shipments of this waste to the company
	D.	disposing of the wash-water screening waste.
		disposing of the wash-water screening waste.
6.	A.	40 CFR Part 265.173(a), required by Part 262.34(c)(1)(i) as referenced by 33 CSR 20 Section 5.1
	В.	Satellite container for paint/thinner in the shop area was not closed.
_		
7.		40 CFR Part 262.34(c)(1)(ii) as referenced by 33 CSR 20 Section 5.1
	B.	Satellite container for paint/thinner in the shop area was not marked with the words "Hazardous Waste" or with other
		words identifying the contents.
8.	Α.	40 CFR Part 265.52(a), required by Part 262.34(a)(4) as referenced by 33 CSR 20 Section 5.1
٥.		CTS Huntington's site contingency plan does not include procedures for personnel to implement in the event of a
		release of hazardous waste.



CECIL H. UNDERWOOD GOVERNOR

District Address: 2006 Robert C. Byrd Drive

Beckley, WV 25801-8320

DIVISION OF ENVIRONMENTAL PROTECTION

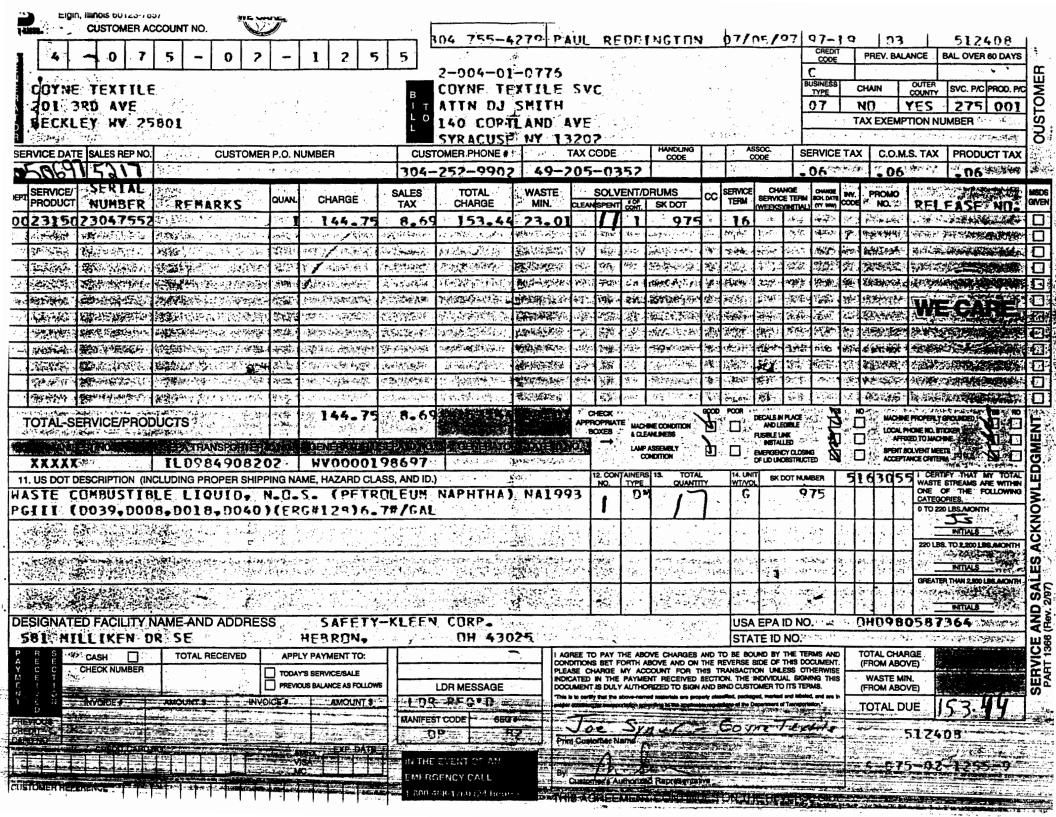
Office of Waste Management

JOHN E. CAFFREY DIRECTOR

NOTICE OF VIOLATION Page 2 of 2

DATE: October 29, 1997	TIME: 1120
ISSUED TO: Coyne Textile Services, Huntington	
EPA I.D.#: WVD052574753	NOV #: IV-790111-09P
FACILITY MAILING ADDRESS: 1111 Vernon Street, Huntington, WV	25704
FACILITY REPRESENTATIVE: Ed Armon, general manager	
You must comply with the above-cited section(s) of the Regulations. In order	to attain compliance with the cited Code and/or
Regulations, you must perform the following remedial actions. It is recommended	ed that you complete the following actions within
60 days of receipt of this Notice:	
(1) Ensure that all Land Ban Notification Forms have all required codes property	erly identified.
(2) Ensure that your facility maintains on file a copy of the Uniform Hazardous	Waste Manifest for each shipment of hazardous
waste from your facility.	
(3) Complete a proper hazardous waste determination for all wastes generate	ed as a result of laundrying solvent-soaked rags
by including the "F" listed (and any other known listed) codes associated	with that waste stream.
(4) Begin sending the wash-water screenings to a hazardous waste TSD fac	ility for disposal as a listed hazardous waste.
(5) Ensure completion of a Uniform Hazardous Waste Manifest for each futi	ure shipment of wash-water screenings to the
disposal facility.	
(6) Ensure that the satellite container of paint/thinner waste is kept closed wh	en not in use.
(7) Ensure that the satellite container of paint/thinner waste is clearly marked wi	th the words "Hazardous Waste" or other words
identifying its contents.	
(8) Update your site contingency plan to include procedures for personnel to in	nplement in the event of a release of hazardous
waste.	
(9) Document your compliance by writing to the Chief, Office of Waste Mana	gement, 1356 Hansford Street, Charleston, WV
25301 and send a photocopy or facsimile of that correspondence to this i	nspector at the address / fax number below.
A copy of this Notice of Violation will be forwarded to the Enforcemen	•
issuance of this Notice may result in an administrative civil penalty being levied	in accordance with West Virginia Code § 22-18-
17.	
District Phone:(304) 256-6850	Issued By: Penny L. Brown
District Fax: (304) 256-6755	Title: Environmental Inspector

ATTACHMENT A INCOMPLETE / INCORRECT MANIFESTS & LBN'S



ONSTITUENTS PRIOR TO DISPOSAL. WILL MONITOR FOR ALL REQUIM PA ID NO.

🍀 0HD980587364

581 MILLIKEN DRESE

HEBRON OH 43025

der menifest/sales service number the generator noted below is shipping to you a waste determined to ocied unds 40 CFR Part 268. In accordance with 40 CFR Part 268.74 the generator hereby provides notice that the waste is restricted from land disposal of this form must be kept by the generator and facility for five (5) years from the date of waste shipment.

HIST . L'E	THE PARTY OF THE P			
	WASTE NAME (FOR NON-WASTE WATER)	WASTE CODE	THE WASTE MAY CONTAIN THE FOLLOWING RESTRICTED CONSTITUENTS	TREATMENT STANDARD OR METHOD
Р		₹D001	Ignitable Liquid (High TOC Subcategory)	Combustion (CMBST)
L	Waste Petroleum		Halogenated Organic Compounds (HOC's)≥1000 mg/l	or recovery (RORGS)(40 CFR 268.42)(non-waste water)
E	Naphtha 105	D006 D008	Cadmium Lead	1.0 (non-waste water) MG/L 5.0 (non-waste water) MG/L
А		D018	Benzene	10 (non-waste water) MG/KG
S		D027	1, 4-Dichlorobenzene	6.0 (non-waste water) MG/KG
E		D039	Tetrachloroethylene	6.0 (non-waste water) MG/KG
-		D040	Trichloroethylene	6.0 (non-waste water) MG/KG
1	關係的	D001	Ignitable Liquid (High TOC Subcategory)	CMBST, or RORGS (40 CFR 268.42)(non-waste water)
Υ		D006	Cadmium	1.0 (non-waste water) MG/L.
	Waste Petroleum Naphtha 140	D008 D018	Lead Benzene	5.0 (non-waste water) MG/L 10 (non-waste water) MG/KG
T	Naprilla 140	D039	Tetrachloroethylene	6.0 (non-waste water) MG/KG
Н	ansa i i i i i		the state of the s	
Ε		D006 D008	Cadmium Lead (C.)	1.0 (non-waste water) MG/L 5.0 (non-waste water) MG/L
	Actrel Solvent	D018	Benzene	10 (non-waste water) MG/KG
А	TCLP is not available)	D039	Tetrachloroethylene	6.0 (non-waste water) MG/KG
		D040	Trichloroethylene	6.0 (non-waste water) MG/KG
P			A CONTRACT SALES AND A CONTRACT AND A SALES AND A CONTRACT AND A C	4.0 (non weste water) MC(I
Р	Aquegus Parts Washer	D006 D039	Cadmlum Tetrachloroethylene	1.0 (non-waste water) MG/L 6.0 (non-waste water) MG/KG
R		D008	Lead	5.0 (non-waste water) MG/L
0		D018	Benzene	10 (non-waste water) MG/KG
Р	Waste Petroleum	D039	Tetrachloroethylene	6.0 (non-waste water) MG/KG
R	Naphtia 150	D040 *	* Trichloroethylene	6.0 (non-waste water) MG/KG
1	Side Siles Author	D006	Cadmium ## DO40 SEE A	コリー・コー・コー・コー・コー・コー・コー・コー・コー・コー・コー・コー・コー・コー
,	Aqueous Brake Cleaner	D039	Tetrachloroethylene	6.0 (non-waste water) MG/KG
T	The state of the s	D001	Ignitable Liquid (High TOC Subcategory)	CMBST, or RORGS (40 CFR 268.42)(non-waste water)
_	Waste Petroleum / Naphtha (sludges from	D006	Cadmium	1.0 (non-waste water) MG/L 5.0 (non-waste water) MG/L
Ε	Safety Kleen Service	D008 D039	Lead Tetrachloroethylene	6.0 (non-waste water) MG/KG
	Safety-Kleen Service Center Operations)	1 2000	. Tourdonnoisouryiono	0.0 (non-wasio water) marks
В		D011	Silver	E O (non wester water) NG/
0	Photo imaging	ווטט	Silver and the control of the contro	5.0 (non-waste water) MG/L
Х	A. A	D006	Cadmium	1.0 (non-waste water) MG/L
Ε		D008	Lead	5.0 (non-waste water) MG/L
S	Wasta Compound	D018	Benzene	10 (non-waste water) MG/KG
1	Cleaning Liquid/	D027	1, 4-Dichlorobenzene Tetrachloroethylene	6.0 (non-waste water) MG/KG 6.0 (non-waste water) MG/KG
	Immersion cleaner 699	D040	Trichloroethylene	6.0 (non-waste water) MG/KG
	Waste Gasoline	D001	Ignitable Liquid (High TOC Subcategory)	CMBST, or RORGS (40 CFR 268.42)(non-waste water)
	III HRAN	D018	Benzene	10 (non-waste water) MG/KG
-		ECIFIC	EXCESS FLUID IN DRUM? OFF-COLOR? MORE T	HAN 30% UNUSUAL UNUSUAL MATERIAL
O P	NUMBER GF	RAVITY		S? (Y/N) ODOR? (Y/N) MICLUDED'ADDED? (Y/
1	A STATE OF THE STA			

MACHINE	SPECIFIC	EXCESS FLUID IN DRUM?	OFF-COLOR?	MORE THAN 30%	UNUSUAL	UNUSUAL MATERIAL
NUMBER	GRAVITY	(MS>2/3)(C>1/3)(Y/N)	(Y/N)	SOLIDS? (Y/N)	ODOR? (Y/N)	INCLUDED ADDED? (Y/
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SPECIFIC GRAVITY ACCEPTANCE GUIDELINES

PRESENTATIVE SIGNATURE

** NO SIGNATURE REQUIRED **

The constituent domposition is based on knowledge of the waste (via Material Safety Data Sheets for the chemical(s) used, and the process which created the waste). These treatment standards do not preclude reclamation prior to final disposition.

Generator Company

COYNE TEXTILE?

EPA ID NO.:

[™] WV0000198697

Salesykleen Corp, manages the above waste through its recycling and fuels programs in accordance with all applicable elements of the land disposal restriction.

COPY 3: FACILITY TO GENERATOR

DEPARTMENT OF ENVIRONMENTAL PROTECTION
TO Elm St., Hartford, CT on 100 SUCJAN 3 0 100 7

tese:	MALIE PA	FOR STATE USE ONLY
***		HAZARDOUS 1. Generator's US EPA ID No. Manifest Document No. W V D 0. 5- 2- 5- 7- 4- 7- 5- 3 of Information in the shaded areas is not required by Federal law, but may be required by State law.
υ.		EXTILES SERVICES
		E, NY 13202 (315) 475-1626
5		Company Name 6. US EPA ID Number ENVIRONMENTAL SERVICES C 'T ·D ·9 ·6 ·3 ·8 ·7 ·2 ·7 ·4 ·8
7	anns kon	Company Name 8. US EPA ID Number
9.		Cility Name and Site Address 10. US EPA ID Number OIL RECOVERY INC
		ACEY AVE
		CT 06451-2270 CT D 0 2 1 8 1 6 8 8 9 1 12. Containers ChiATTotal 13 14. Unit:
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		C HYDRACARBONS) 3, UN1993, PGIII 0 0 1 T T 05000 G MATE
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	7.	ing Instructions and Additional Information
		EMERGENCY RESPONSE GUIDE BOOK: GUIDE# 27
11		Point of Departure:
		de name and are classified, backed, thanked and labeled, and are in all respects in proper condition of the proper
~		iracticable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present
		That to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and waste management method that is available to me and that I can afford. Name Signature Month Day Year
7		Ocknowledgement of Receipt of Materials Signature
1		OF P. Dow Senge R Du 1011797
10		icknowledgement of Receipt of Materials Name in Signature Signature Month Day Year
9		ication Space
2		Appr. Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19/
o		Signature Signature

ation under 40 CFR 268.	s waste as defined in 40 CFR 261 and is not subject to
from land disposal unless treated to the standards I understand that United Oil Recovery, Inc. and	and therefore regulated under 40 CFR 268. This waste is under 40 CFR 268.40 or specifically exempt under this Bridgeport United Recycling, Inc. operate treatment systems vastewater vastewater as defined in this Subpart.
Solvent Wastes	Characteristic Wastes
Fio1, F002, F003, F004, F005	D001 Ignitable Liquids, High TOC (>10%) D001 Ignitable Liquids, Low TOC (<10%) D004 Arsenic
Benzene - n-Butyl Alcohol	D018 Benzene D006 Cadmium
Carbon Disulfide Carbon Tetrachloride Chlorobenzene	D019 Carbon tetrachloride D021 Chlorobenzene D022 Chloroform
Cresol (m- and p- isomers) Cresol (o- isomer) Cyclohexanone	D007
1,2-Dichlorobenzene Ethyl Acetate Ethyl Benzene	D025 p-Cresol D026 Cresol D027 1,4-Dichlorobenzene
Ethyl Ether Lsobutanol	D028 1,2-Dichloroethane D029 1,1-Dichloroethylene
Methanol Methylene Chloride Methyl Ethyl Ketone	D030 2,4-Dinitrotoluene D032 Hexachlorobenzene D033 Hexachlorobutadiene
Methyl Isobutyl Ketone Nitrobenzene Pyridine	D034 Hexachloroethane D008 Lead
Tetrachloroethylene Toluene	D035 Methyl ethyl ketone D036 Nitrobenzene D037 Pentrachlorophenol
1,1,1-Trichloroethane 1,1,2-Trichloroethane 1,1,2-Trichloro-1,2,2-Trifluoroethane	D038 Pyridine D011 Silver D039 Tetrachloroethylene
Trichloroethylene Trichlorofluoromethane	D040 Trichloroethylene D041 2,4,5-Trichlorophenol
Xylenc	D042 2.4,6-Trichlorophenol Vinyl chloride

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EPA Form 8700-22 (Rev. 9/88)

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THE P	diffional Codes below					
) Mark	Treatment	Non- Waste	<u>Treatment</u>	Non-		
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	364-16					
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HAZARDOUS WASTE RESTRICTED FROM LAND DISPOSAL NOTICE

On 1	Manifest	t number MI	47029	79 line item	(A,B,C, or D) the waste bearing the EPA
1 12 17 18 2	1 11 1 11 11	vaste number(s			is subject to	the land disposal restriction of 40
				CFR 268 7 this	generator is providing	notice that the waste does not
						et the prohibitions specified in
400	pror K	CRA section 3	004 (d). In	e treatment stat	ionios tol mis testricie	d waste is/are as follows:
Hazi	detis (Constituents of Con	cern	Non-Wastewater	Constituents of	Non-
Waste	9 11		<u>T</u>	otal Composition,	Concern	Wastewater
Code	1111			mg/kg	1.96	<u>Total</u> <u>Composition</u>
						, mg/kg
旦中	1411.331	Acetone	<u> </u>	160		□ 36 □ 33
	1 11 14 30	Benzen e 1-Butyl alcohol	. 0	2.6 4.81(TCLP)	1.11.11.11.11.11.11.11.11.11.11.11.11.1	□ 33 □ 14
H	4 (5 S 3 M)	Carbon disulfide	ā	6.0		16
O HO	4	Carbon tetrachloride		6.0		5.0
	4497 Ak()	Chlorobenzene	0	5.6 (ea)	Loidelle	□ 10 □ 6.0
	4.311.4933	o,m,p Cresols Cyclohexanone	ä	0.72 (TCLP) 6.0	Titt tricinorcements	
	3 (13/3/5)	1,2 Dichlorobenzene	□.	33	1,1,2-Trichloro-1,2,2-	1 30
	3 // 1.3 · 5 /4/2	Ethyl acetate		10	THE POLYMENT OF THE PARTY OF TH	□ 15 1 6.0 □ 15 1 30
	2 (19 1) 13 (14 1)	Ethylbenzene Ethyl ether	<u> </u>	160 170	LITCHEOLOGISTALOHO	□ 30 □ NCIN
	3 2 1 3 2 3 3 3 4 7	Isobutanol		0.75(TCLP)	2-Ethoxyethanol	INCIN
		Methanol	. 0	30	2-Nitropropane	■ 전원속으로 역 기계에서
		Methylene chloride				
Wite	e Carle		Treatment	Sub category	Non-waste	
		f 26. 3.4 - 12 2.4	- b 40 CF	T 261 21 award for	water	Standards (268.42) DEACT & meet UTS, or
				R 261.21, except for ategory, managed in I		RORGS, or CMBST
d d		CWA/Non CW	A equivalent, no	n-Class 1 SDWA Sys	tems	
		Ignitable charac	teristic wastes, e	xcept for the 261.21(a)(1) High	DEACT
		alent/Class 1 SI		aged in CWA/CWA-	equiv-	
Ецю		Ignitable liquid	s based on 40 CI	R 261.21(a)(1) - Hi	gh TOC □	RORGS or CMBST
18		Ignitable Liquid	i Subcategory - 1	reater than or equal	o 10% TOC	
			Non-waste wate	Treatment S	ubcategory (if applicable)	
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NORTRU INC. 515 LYCASTE STREET, DETROIT, MICHIGAN 48214

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EDEPARTMENT OF ENVIRONMENTAL PROTECTION

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	# 15	Fiden, CT 06451-2270 C	T D O 2 1	4 75	8 .8 .9		% 13,-∪	-14.	X1 - 34 - 7
	9	Description (Including Proper Shipping Name, Hazard Class	, and ID Number)		No.		Total Quantity	Unit Wt/Vol	N. S. C.
i j	Ä	MASTE FLAMMABLE LIQUID M.O.S. (AL MATIC HYDRACARBONS) 3, UN1993, PG			0.0.1		x500	3	*
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16		H Handling Instructions and Additional Information RGENCY 24 HOUR PHONE: (203) 235-	3753		As an area	120 X 10 C	station in the second s		
	6/ 1/ 1/	PADL EMERGENCY RESPONSE GUIDE BO		/ IX	128 t of Departu	ıre:			• •
A STATE OF THE STATE OF	ero rano	RATOR'S CERTIFICATION: I hereby declare that the contents of shipping name and are classified packed, marked, and label aring to applicable international and national government regular a large quantity generator. I certify that I have a program in plus a large practicable and that I have selected the practicable muture threat to human health and the environment; OR, if I am a title best waste management method that is available to me and	ed, and are in all te ations; and all applie ace to reduce the vo ethod of treatment. I small quantity gen	spects in beable State blume and to storage, blume erator, I have	Topes cond laws and re exicity of w	tion for it gulation aste gene	ransport by hig erated to the de	gree I have	determined to b mizes the preser ste generation an
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7		Last the strategic and the state of the strategic and the state of the	/				galerala y s	7": " S 6	
Q	H	Owner or Operator: Certification of receipt of hazardous mater	Signature	manifest e	xcept as no	ted in ite	m 19) <u>"</u>	ionth Day Ye
		nc Sitesos	While.			ركام	ous C	· (13-209
131	TH	22 (Rev. 9/91) Form Approved OMB No. 2050-0039. Expires 9/30/96. Prev	ous edition is obsolete.	1	1//	10	Contract of		ger Mei von

COPY 3: FACILITY TO GENERATOR

DEPARTMENT OF ENVIRONMENTAL PROTECTION

TESTINAM STEAM SUCHARAGON WAS MANUFET PROGRAM RECEIVED MAY 2-2 1997

Plea	NAME OF	(Form designed for use on slite (12-bitch) types	79 Elm St., Hartford, CT	06108-5127		1999,9 <u>C</u> 1001
		FORM HAZARDOUS 12 plich) types	INCIALUI S US EPA II) NA	- Manifoot	I O Dece to the contract of	
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Land Ban No	otification Form
COYNE TEXTILES SERVICES	
	Manifest Number CTP0585359
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高信能 (2.1) を引揮 対象を表する (3.1) A	fined in 40CFR 261 and is not subject to regulation under 40 CFR 268
sposal unless treated to the standards under 40 CFR 268.40 or	erefore regulated under 40 CFR 268. This waste is banned from land specifically exempt under this Subpart. I understand that United Oireatment systems that are regulated under the CWA. This waste is spart. The applicable waste codes are checked below.
pen Solvent Wastes	Characteristic Wastes
F001, F002, F003, F004, F005	D001 Ignitable Liquids, High TOC (>10%)
1002, 1004, 1005	
Adeim E	D001 Igintable Exquitis, E6w 16c (10%)
	D018 Benzene
A Nith Alcohol	D006 Cadmium
Cathern Disulfide	D019 Carbon tetrachloride .
Carten Tetrachloride	D021 Chlorobenzene
Charolenzene	D022 Chloroform
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issa in- isomer)	D023 o-Cresol
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zene	D035 Methyl ethyl ketone
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their there if the waste meets the treatment standards) I certify under pena	Title DRVV ATOV.

STATE OF CONNECTICUT RETMENT OF ENVIRONMENTAL PROTECTION

A NEW PORT	79 Elm St., Hartford, CT 06106-5127 RECEIVED JULFOR STATISTE ONLY
UNIT WA	RM HAZARDOUS 1. Generator's US EPA ID No. STE MANIFEST W. V. D. O. 5. 2. 5. 7. 4. 7. 5. 3. 1. 8. 5. 2. 8. 6. ol. 1. Information in the shaded areas is not required by Federal law, but may be required by State law.
COYNE	s Name and Mailing Address TEXTILES SERVICES
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	scription (Including Proper Shipping Name, Hazard Class, and ID Number)
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	Scriptions for Materials Listed Above K1Handling Godes for Wastes Listed Above
ARMAN TAR	VATER TREATHENT SLIDGE
	ndling Instructions and Additional Information
UB29A	NCY 24 HOUR PHONE: (203) XXXXXXXX 238-6745 L EHERGENCY RESPONSE GUIDE BOOK: GUIDE# XXX 128
GENERAT	Point of Departure: OR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by
1 eccoung	ping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway applicable international and national government regulations, and all applicable State laws and regulations.
and future	by practicable and that I have selected the practicable method of treatment, storage, of disposal currently available to me which minimizes the present threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and best waste management method that is available to me and that I can afford.
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egited ty	d Name Signature Month Day Year
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	9/91) Form Approved OMB No. 2050-0039. Expires 9/30/96. Previous edition is obsolete.
	COPY 3: FACILITY TO GENERATOR

THE THE EVENT OF A SPILE, CONTACT THE METCHAL RESPONSE GENTER US COUST QUARD LIMITIAL SWITCH SWITCHING CONTACT STREETS GENERAL SPILE


Avenue, Meriden, CT 06451-2270



Land Ban Notification Form

		Manifest:Number CTE0585-386
Northezartious Waste. This waste is not hazardous	waste as defin	ned in 40CFR 261; and is not subject to regulation under 40 CFR 268.
real unless treated to the standards under 40 CFI well line and Bridgeport United Recycling, Inc.	R 268.40 or sp c. operate trea	refore regulated under 40 CFR 268. This waste is banned from land specifically exempt under this Subpart. I understand that United Oil atment systems that are regulated under the CWA. This waste is a art. The applicable waste codes are checked below.
ient Solvent Wastes		Characteristic Wastes
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Acted		D001 Ignitable Liquids, Low TOC (<10%)
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il-Buty Alcohol		D018 Benzene D006 Cadmium
Carbon Disulfide		D009 Carbon tetrachloride
Garbon Tetrachloride	1	D019 Carbon tetracmonde
Chlorobenzene		D021 Chloroform
Cresol (m-and p- isomers)		D0022 Chromium
Cresol (o- isomer)		D007 Cinonium D023o-Cresol
Cyclohexanone		D023 G-Cresol
2 - Dichlorobenzene		D024 Sm-Cresol
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Ethyl Benzene		D0201,4-Dichlorobenzene
Ethyl Ether		D028 1,2-Dichloroethane
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Methanel		D030 2,4-Dinitrotoluene
CTTABLE 114 ALL WAY		D032 & Hexachlorobenzene
Methylshe Chloride		D033 Hexachlorobutadiene
Methy Ethyl Ketone		D034 Hexachloroethane
Methy Isobutyl Ketone		D008 Lead
Vitrobenzene		D035 Methyl ethyl ketone
Pythone		D036 Nitrobenzene
Tetrachioroethylene		D037 Pentrachlorophenol
Toluene	4.2	D038 Pyridine
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r in the fluoromethane		D042 2,4,6-Trichlorophenol
	D. 3/4	D043 Vinyl chloride
		To the state of th

ough knowledge of the waste to support this certification that the waste complies with the standards specified in 40 CFR Part 268 Subpart D and all as set forth in 40 CFR 268, 32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that for submitting a false certification, including the possibility of a fine and imprisonmen

UNIFORM HAZARDOUS 1. Gene WASTE MANIFEST	rator's US EPA ID No. 0 5 2 5 7 4 7 5 3 6 Doc	fanifest ument No.	2. Page	beniupen 🐪	n in the shaded a by Federal law, b	reas is no ut may be
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COPY 3: FACILITY TO GENERATOR



136 GRACEY AVENUE MERIDEN, CT 06451-2270 TEL. (203) 238-6745 FAX (203) 630-2503

Work Order No : 00079550 000001

Date: 08/19/97

Notice that COYNE TEXTILE SERVICES 140 CORTLAND AVE

COYNE TEXTILES 1111 VERNON ST

SYRACUSE, NY 13202 D J SMITH (315) 475-1626

HUNTINGTON, WV 25704 KEVIN PERRETTA

(304) 429-5585

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DEPARTMENT OF ENVIRONMENTAL PROTECTION

Hazardous Waste MANIFEST PROGRAM
79 Elm St., Hartford, CT 06106-5127

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AR CERTLAND AVE SYNACUSE, NY 10202			
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15. Social Handling Instructions and Additional Information			
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DEPARTMENT OF ENVIRONMENTAL PROTECTION Hazardous Waste MANIFEST PROGRAM 79 Elm St., Hartford, CT 06106-5127

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20	Facil	1	ner or Operator: Certification of receipt of hazardous materials covered by this manifest	except as no	ted in Item 19			_!
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DEPARTMENT OF ENVIRONMENTAL PROTECTION

79 Elm St., Hartford, CT 06106-5127 FOR STATE USE ONLY 1. Generator's US EPA ID No. Information in the shaded areas is no required? by Federal law? but may be ASTE MANIFEST required by State law. r's Name and Mailing Address ter 1 Company Name INDUSTRIAL SERVICES ter 2 Company Name of election of the state in which til 10. US EPA ID Number ed Facility Name and Site Address OIL RECOVERY THE ZMI Total 13 Description (Including Proper Shipping Name, Hazard Class, and ID Number) THI No. S. A. Hot Quantity an - on the lot form when the ITETAINS, THE YOU'D. Western private canons. 5 (Solidal landling Instructions and Additional Information LANG TANAHAMATA IN TERATOR'S CERTIFICATION: Legeby declare that the contents of this consignment are fully and accurately described above by indispoling name and are classified, packed, marked, and labeled, and are in all respects in the condition to manaport by high contents in applicable international and halford povernment regulations, and all applicable international and halford povernment regulations. arge quantity generator. I certify that I have a program in place to reduce the following the total of the degree I have determined to be ally practicable and that I have selected the practicable method of treatment, storage for disposal currently available to me which minimizes the present threat to human health and the environment; OR, If I am a small quantity generation to make a good fall the floor to minimize my waste generation and ri2 Acknowledgement of Receipt of Materials ... beland ast waste governity received at the Jedity Any released man begunder a particular to portion reporting to Mename of the pason accepting the Maste on ban esage notablent the Walle described in the righted by standy by hands & or lark county lexcept for some specified in ham 381 & someone with the REDURED TO COMPLY WITH THE MANIFESTING REQUIRE TE OF INFORMATION AND RESERVED COPY 8: GENERATOR RETAINS